

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARIBEL RODRIGUEZ,)	
)	No. 08 C 2020
Plaintiff,)	
v.)	
)	
CITY OF CHICAGO, ILLINOIS, and)	
CHICAGO POLICE OFFICERS)	Judge Castillo
M. B. KAZARNOWICZ, Star No. 9003,)	
M. J. LOPEZ, Star No. 7433, and)	Magistrate Judge Cole
VIRGINIA WARNECKE, Beat No. 1134,)	
)	
Defendants.)	

**DEFENDANTS' AGREED MOTION FOR AN
EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendants City of Chicago (“the City”), Kazarnowicz, Lopez, and Warnecke (collectively “defendants”), pursuant to Federal Rule of Civil Procedure 6(b), move this Court for an extension of time until July 11, 2008, to answer or otherwise plead to plaintiff’s complaint. In support of this motion, defendants state as follows:

1. Plaintiff filed her six-count complaint on April 9, 2008. The complaint alleges federal claims under 42 U.S.C. § 1983 and Illinois state law claims against the City and three Chicago police officers.
2. On June 4, 2008, the Court granted defendants time until June 30, 2008, to answer or otherwise plead to plaintiff’s complaint.
3. In accordance with Judge Castillo’s case management procedures, on June 20, 2008, defendants served plaintiff with a letter informing her of their intention to move this Court to dismiss, with prejudice, two of plaintiff’s claims against them, and summarizing the legal and factual bases for defendants’ motion.

4. Plaintiff's counsel is currently on vacation. He will return on June 30, 2008, the day defendants' responsive pleading is due in court. Prior to going on vacation, on June 20, 2008, plaintiff's counsel advised counsel for the City that while he agrees with the legal bases for defendants' proposed motion, he needs to verify the factual bases for the motion - which he can do only after he returns on June 30, 2008 - before plaintiff can consider signing a stipulation to dismiss, with prejudice, two of her claims.

5. Therefore, defendants request until July 11, 2008 to answer or otherwise plead in response to plaintiff's complaint.

6. This motion is not brought for the purpose of delay or any other improper purpose, but so that the parties can make a sincere effort to resolve issues relating to defendants' proposed motion to dismiss, in accordance with Judge Castillo's case management procedures. In addition, the parties would like to resolve all pleading-related issues before attending the settlement conference set for July 16, 2008.

7. Plaintiff will not be prejudiced if the requested extension of time is granted, nor does she have any objection to this motion.

For these reasons, defendants request that the Court grant their motion for an extension of time to and including July 11, 2008, to answer or otherwise plead to plaintiff's complaint.

Respectfully submitted,

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Dated: June 24, 2008
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